

1. Debtors filed a petition under Chapter 13 of Title 11 on 5/31/2016.
2. Debtors case was dismissed on November 3, 2021 for failure to make their final Trustee payment.
3. Debtors' miscalculated when their sixtieth monthly payment was to be made and

inadvertently believed that May of 2021 was their last month when in fact it was June of 2021.

4. In May of 2021, Debtor was diagnosed with dementia and his pandemic federal unemployment payment ended; this combined caused a major financial shift for the Debtors, which is why no payment has been received.
5. Debtor's have had to adjust to living on a single social security monthly payment; Joint Debtor was a homemaker her entire life and has procured on and off seasonal jobs in the beauty industry but is caring for her granddaughter full time which makes it difficult to find full time employment. This has been the reason for the year delay in making the final payment. Debtor's do not have additional debt and have adjusted to a decreased living standard and budget.
6. Debtor's need a discharge in order to live peacefully in retirement and not be subject to the stress imposed onto a person stuck in a debt cycle.
7. For this reason, Debtors requests that their case be reinstated to the court's active docket and their final payment be disbursed accordingly allowing their Notice of Plan Completion be filed and subsequent Motion for Entry of Discharge.
8. This motion is not made for the purposes of delay and no creditor will suffer any prejudice if Debtors' motion is granted.

WHEREFORE, PREMISES CONSIDERED Debtors **Jack E Isom and Sherri A Isom** respectfully request the Court to Vacate Dismissal Order and Reinstate Debtors' bankruptcy to the Court's active docket; and for such other relief the Court may grant.

Respectfully Submitted,

MP Wright Law Group, PLLC

/s/ M. Paul Wright

M. Paul Wright

State Bar No. IL 6298791

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ATTORNEY FOR DEBTOR(S)

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that he has conferred with the Office of the Standing Chapter 13 Trustee and has been informed that the Chapter 13 Trustee opposes this Motion until the final payment has been made to the Trustee.

/s/ M. Paul Wright

M. Paul Wright

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 21, 2022, a true and correct copy of the foregoing was served on all parties in interest below.

Standing Chapter 13 Trustee

Pam Bassel
7001 Blvd 26, Suite 150
North Richland Hills, Texas 76180

US Trustee

UST US Trustee
1100 Commerce St.
Room 976
Dallas, TX 75242-1496

Debtors

Isom, Jack E
2117 Bancroft Ct
Arlington, TX 76017

Parties In Interest

Arlington ISD
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500 E. Border St
Ste 640
Arlington, TX 76010

City of Arlington
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2777 N. Stemmons Frwy
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/s/ M. Paul Wright
M. Paul Wright
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